

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

MALIBU MEDIA, LLC, )  
                        )  
Plaintiff,             ) Civil Case No.: 2:13-cv-00536-RTR  
                        )  
v.                     )  
JOHN DOE subscriber assigned IP     )  
address 184.58.186.212,                 )  
                        )  
Defendant.             )  
                        )

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**PLAINTIFF'S MOTION FOR LEAVE TO FILE ITS AMENDED COMPLAINT  
UNDER SEAL**

Plaintiff, Malibu Media, LLC ("Plaintiff"), moves for entry of an order to file its Amended Complaint under seal, and states:

1. On May 15, 2013 this Court entered an Order [CM/ECF 7] granting Plaintiff leave to serve a third party subpoena on Defendant's Internet Service Provider so that it may identify the John Doe Defendant and proceed with its copyright infringement lawsuit.
2. On May 17, 2013, Plaintiff issued its subpoena to Subpoena Compliance Team, Road Runners/Time Warner Cable's registered agent, and received the ISP's response on October 15, 2013.
3. On September 17, 2013, this Court entered an Order [CM/ECF 18] granting the Defendant Leave to Proceed Anonymously. As such, Plaintiff is prohibited from naming the Defendant in its Amended Complaint.
4. Plaintiff respectfully requests that this Court allow Plaintiff to file its Amended Complaint under seal, so that the Defendant's identity is not made public.
5. Good cause exists to grant this motion.

WHEREFORE, Plaintiff respectfully requests that the Court allow the Plaintiff to file their Amended Complaint under seal. A proposed order is attached for the Court's convenience.

Dated: November 1, 2013

Respectfully submitted,

SCHULZ LAW, P.C.

By: /s/ Mary K. Schulz

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 1, 2013, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that service was perfected on all counsel of record and interested parties through this system.

By: /s/ Mary K. Schulz